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LESLEY J. LANOIX \*  
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May 3, 2022

**VIA ECF**

Honorable Colleen McMahon  
United States District Court Judge  
United States District Court for the Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re:** Elvia Perez-Victorio et al. v. City of New York et al., 19 CV 421 (CM)(GWG)

Dear Honorable Judge McMahon:

This office represents the Plaintiff in the above-referenced matter. We respectfully write to request an Extension of Time to file the Final Joint Pre-Trial Order. Said request is on consent with the Defendant City of New York.

The Civil Case Management Plan that Your Honor So Ordered on August 1, 2019, called for the Final Pre-Trial Order to be filed on or before May 2, 2020. (See Docket No. 22) Subsequent to that Your Honor granted Plaintiff's requests to extend discovery. (See Docket Nos. 32 and 35) In addition, when Defendant made an application for an extension of time to file Motions for Summary Judgment Your Honor indicated that until we see that the Complaint is amended all dates were adjourned sine die. (See Docket No. 42) In the Court's written decision denying Plaintiff's Motion for Leave to Amend the Complaint, Your Honor referenced that the Court expected the Final Pre-Trial Order to be filed by today, May 3, 2022. (See Docket 53 at page 8) Since said decision, Your Honor, did So Order a briefing schedule for the filing of a Motion for Summary Judgment. (See Docket No. 55) Neither Plaintiff nor Defendant were aware that Your Honor had previously selected the date of May 3, 2022, for the filing of the Final Pre-Trial Order. As a result of the foregoing, we respectfully request an Extension of Time for the filing of the Final Pre-Trial Order to a date after the Defendant's Motion for Summary Judgment has been decided.

USDC SDNY
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DOC #:
DATE FILED: 5/4/2022

OK

Colleen McMahon  
5/4/2022

MEMO ENDORSED

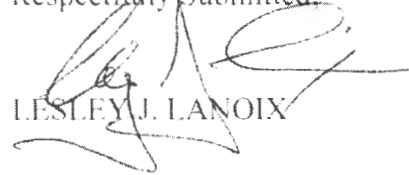
HONORABLE COLLEEN MCMAHON

May 3, 2022

Page 2

We thank Your Honor for any consideration given. Kindly advise should Your Honor require any additional information.

Respectfully Submitted,



LESLEY J. LANOIX

LJL:

cc: Peter W. Brocker, Esq., New York City Law Department (*Via ECF*)  
Ms. Elvia Perez-Victorio